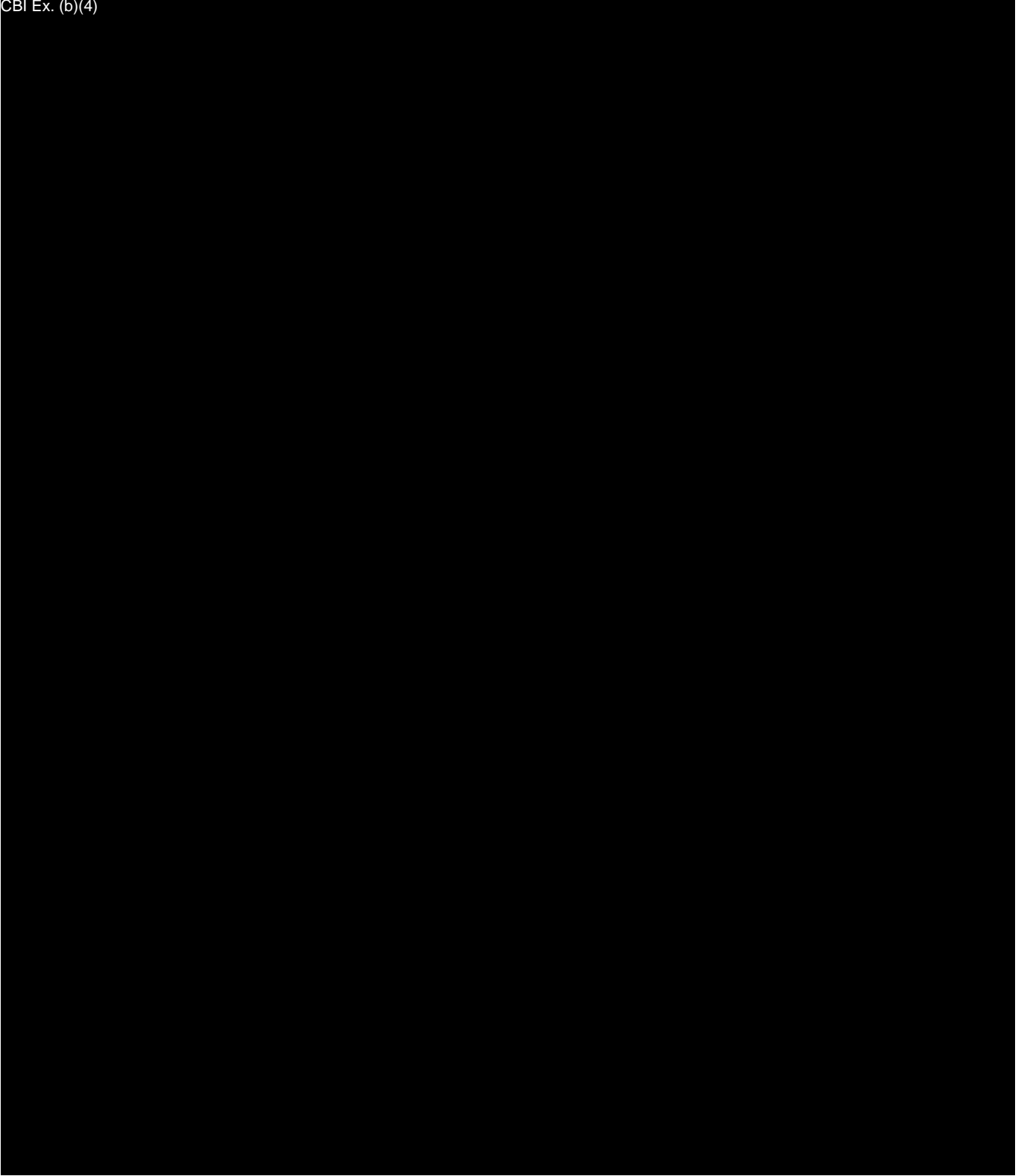


CBI Ex. (b)(4)



Introduction

The Limetree Bay refinery (LBR) was recently restarted in 2021 after having been mothballed in 2012. After a number of significant flaring events and major process upsets, EPA issued a Clean Air Act Emergency Order (CAA-02-2021-1003) requiring that a third party shall be hired to do an audit of the delayed coker unit (DCU). CBI Ex. (b)(4)

The audit scope was as follows,

- a. Releases to Flare #8, particularly high liquid loading that has occurred, what caused them, and physical changes and operating changes to prevent them from happening in the future.
- b. Releases since February 2021 of volatile organics directly to the atmosphere from the coker unit, and particularly from the steam vent prior to decoking, what caused them, and physical changes and operational changes to prevent such releases from happening again in the future.
- c. An evaluation of staffing with regard to the operation and maintenance of the process unit, including staffing levels and whether operators have proper experience and training to operate the coker unit safely and within required environmental limits.
- d. The content of the Coker Audit shall not be limited to the list of items in (a)-(c) if CBI Ex. (b)(4) determines that additional evaluation should be conducted to prevent emissions or incidents that could endanger public health or welfare or the environment.
- e. On or before June 25, 2021, CBI Ex. (b)(4) shall simultaneously submit an audit report ("Audit Report") to LBR, EPA (at the contacts listed in below), and VIDPNR (at the contacts listed below).
- f. The Coker Audit Report shall include all findings, conclusions, monitoring results, and other observations of CBI Ex. (b)(4) as described above in Sections a-d.
- g. For each finding, conclusion, and/or observation including, if any, recommendations for physical changes and operating changes to prevent recurrence, indicate whether implementation is necessary prior to restart to prevent an imminent and substantial endangerment to public health or welfare, or the environment;
- h. The Audit Report shall describe, list, or reference all documents that CBI Ex. (b)(4) reviewed and identify all Facility personnel interviewed in support of the Audit Report. A copy of all such materials must be attached to or submitted along with Audit Report.
- i. Before submission of the Audit Report, CBI Ex. (b)(4) must not share any draft or preliminary audit findings or reports with LBR in any format (electronic, paper, or verbal). CBI Ex. (b)(4) also must not share its audit conclusions with LBR prior to submission of the Audit Report.

CBI Ex. (b)(4)

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